

EXHIBIT A

Irving H. Picard v. ABN AMRO Bank (Ireland) Ltd., et al., No. 10-5355 (SMB) - Duplicative Document Requests

<u>Trustee's Proposed Request</u>	<u>Rule 2004 Subpoena RFPs¹</u>
<p>(1) "Documents concerning the review, analysis, due diligence, and ongoing monitoring of actual or prospective investments and transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products."</p> <p>(2) "Documents concerning Defendant(s)' investment decision, evaluation, approval, disapproval, or ongoing monitoring of any investments or transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products."</p>	<ul style="list-style-type: none"> • <u>RFP 15</u>: "All documents comprising or concerning communications . . . regarding Madoff, including but not limited to direct or indirect communications between and among Madoff, [ABN Fund Services, and] . . . any Fund" • <u>RFP 19</u>: "All documents concerning any and all investments with Madoff . . . including but not limited to investments made by . . . any . . . Fund" • <u>RFP 28</u>: "All documents related to due diligence of Madoff by [ABN Fund Services] . . . or any . . . Fund" • <u>RFP 32</u>: "All documents and communications . . . concerning Madoff's investment strategy and performance."
<p>(3) "Documents concerning fraud, Ponzi, illegality, front-running, investigations, insolvency, or embezzlement at BLMIS or Feeder Funds."</p>	<ul style="list-style-type: none"> • <u>RFP 32</u>: "All documents . . . concerning Madoff's investment strategy and performance, including . . . any and all . . . front-running, Ponzi schemes, fraud or fraudulent schemes."

¹ The ABN Defendants' brief included numerous additional examples of duplicative requests in footnotes. See No. 10-5355, ECF No. 134 at n. 9, 11. As these are largely cumulative, they have been excluded here.

<u>Trustee's Proposed Request</u>	<u>Rule 2004 Subpoena RFPs¹</u>
(4) "Documents concerning fees, rebates, commissions, retrocessions, or any other remuneration paid to or by Defendant(s), related to investments and transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products."	<ul style="list-style-type: none">• <u>RFP 27</u>: "Documents sufficient to demonstrate all fees, commissions, rebates or other compensation arrangements and/or payments between [ABN Fund Services and various feeder funds.]"